IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

BICH-CHAU THI TRAN, ET AL.,	§	
Plaintiffs	§	
	§	CASE NO. 4:09-CV-02653
v.	§	
	§	
COMPUTER TECHNOLOGY	§	
SOLUTIONS, L.P.	§	
Defendant	§	

<u>PLAINTIFFS' RESPONSE TO THE DEFENDANT'S RESPONSE TO PLAINTIFFS'</u> MOTION FOR LEAVE TO AMEND THE COMPLAINT AND TO JOINT PLAINTIFFS

COME NOW, Plaintiffs BICH-CHAU THI TRAN, et al. (collectively "Plaintiffs"), files this Response to the Defendant's Response To Plaintiffs' Motion for Leave, and in support would show this Honorable Court the followings:

I. SUMMARY OF PLAINTIFFS' ARGUMENT

Plaintiffs file the Motion for Leave to Amend on or about April 9, 2010 because Plaintiffs recently discover facts that may only be redressed through class-wide litigation. Consistent with the allegations in Plaintiffs' First Amended Complaint, the Motion for Leave to Amend Complaint will allow Plaintiffs to present additional facts to the Court in order to allow the Court to make a determination on whether a conditional certification of class action is warranted.

The motion filed by Plaintiffs on April 9, 2010 sought leave from the court to file Plaintiffs' Motion for Conditional Certification of Class Action in order to add similarly situated Plaintiffs who are eligible to join this lawsuit. Good cause exists for the proposed amendment,

and joinder of the proposed class of Plaintiffs is proper. The amendment will not prejudice Defendant, who has yet to take any specific discovery from any Plaintiffs. Plaintiffs initiated their initial discovery on March 4, 2010. Defendant initiated its discovery request on or about April 2, 2010. In fact, Plaintiffs have extended the deadline for Defendant to respond to Plaintiffs' initial discovery requests until April 16, 2010. The discovery period is still open. Expert reports have not yet been served.

Plaintiffs move for leave to amend as soon as possible because Plaintiffs' counsel recently discovered credible evidence that link Defendant's involvement through Defendant's "alter ego", a company called Computer Repair. Based on this newly discovered evidence, which was obtained by Plaintiffs' counsel independently from Defendant's April 16 discovery responses and shortly before April 9, 2010, Plaintiffs believe that Plaintiffs can now conclusively establish that Defendant intentionally and willfully violate Title 29, Chapter 8, the Fair Labor Standards Act ("FLSA"). Specifically, the claims of Plaintiffs and those similarly situated concern violations of the Fair Labor Standards Act which provides that employees must be compensated at a rate of one and one-half times the regular rate of compensation for all hours worked in excess of 40 hours in a work week.

Further, Plaintiffs also believe that Plaintiffs can now prove with credible and factual evidence that Defendant CTS and Computer Repair are jointly liable to Plaintiffs under the "Joint Employer" Doctrine. Plaintiffs also prepare to prove through this newly discover evidence (see

¹ See Walling v. Friend, 156 F. 2d 429, 432 (8th Cir. 1946); Interpretative Bulletin No. 13 (1940).

attached <u>Exhibit A</u>) that it is not only the involvement of the current named Plaintiffs, but there are other potential and similarly situated Plaintiffs whose names and signatures were included in this evidence as well; hence, the proposed leave to joint additional Plaintiffs, pending this Court's approval of proper notices.

Plaintiffs will prove that the document attached as *Exhibit A* is a document prepared internally by Defendant and its "alter ego", Computer Repair to pay Plaintiffs as well as the unnamed Plaintiffs for additional hours worked at Defendant's facility. Plaintiffs prepare to prove that Defendant setup Computer Repair in a deliberate effort to avoid paying Plaintiffs and the unnamed Plaintiffs additional overtime for computer repair works that were part of Defendant's normal business practices. Plaintiffs will further prove that Defendant systematically required Plaintiffs and the unnamed Plaintiffs to sign their names onto the document, which was prepared by pay period, to certify that the amounts reflected on the document and/or spreadsheet are correct. After the document is fully signed, Defendant then instructed Computer Repair to issue check payments to Plaintiffs and unnamed Plaintiffs similar to the copy of a check attached to Plaintiff Nuong Nguyen's affidavit herein (see attached *Exhibit B*: Sworn Declaration of Plaintiff Nuong Nguyen and the attached *Exhibit 3 of the sworn declaration*).

Plaintiffs will also prove that Computer Repair is an "alter ego" setup by Defendant by virtue of the fact that Tony Nguyen, the principal owner of Computer Repair, is a current and full-time employee of Defendant. Defendant also admitted through discovery that there is no

written contract between Defendant and Computer Repair (see attached *Exhibit D*: Defendant's Response To Plaintiff's Request for Production: Trial Document, answer number 7).

Based on the discovery responses produced by Defendant on April 16, 2010, Plaintiffs are now preparing to prove on a class-wide basis that the Defendant intentionally, systematically, and willfully altered the time records of its employees, including that of unnamed Plaintiffs. Plaintiff Nuong Nguyen attached affidavit and the pertinent exhibits therein clearly indicated the involvement of Computer Repair, the "alter ego" setup by Defendant CTS.² Plaintiff Nuong Nguyen also submits her summary of time records for a sample period (see attached *Exhibit C*) in which Defendant intentionally altered her timesheet through Defendant's payroll system.³ If the Court were to examine the electronic time records produced by Defendant under *Exhibit C* in comparison to the attached affidavit by Plaintiff Nuong Nguyen and the copies of her paystub, the Court will have enough factual evidence to conclude that Defendant systematically and intentionally altered its employee's electronic time records in order to avoid paying overtime as required under FLSA.

In light of the recently obtained evidence as well as the additional documents produced by Defendant on April 16, 2010, Plaintiffs respectfully request this Court for leave to file Plaintiffs' Motion for Conditional Certification of Class Action and to joint additional Plaintiffs. Plaintiffs

² See Bowman v. Pace Co., 119 F.2d 858, 860 (5th Cir. 1941); Where the Fifth Circuit has commented that the presense of collusion between the admitted employer and the proposed joint employer, for the purposes of avoiding the requirements of the FLSA, would conclude in a finding of joint employment.

³ This is a direct summation and details of the electronic time records produced by Defendant through Plaintiff's request for production: CTS 001513 through CTS 001535.

hereby incorporate Plaintiffs' prior motion for leave as if repeated verbatim.

II. CONCLUSION

For the foregoing reasons, Plaintiffs respectfully ask this Honorable Court to grant the Motion for Leave to Amend the Complaint and to Join Plaintiffs. Plaintiffs are prepared to file Plaintiffs' Motion for Conditional Certification of Class Action as soon as leave is given.

Respectfully submitted, **BUI & NHAN, P.L.LC.** 3921 Ocee Houston, Texas 77063 Tel: 713-783-2466

Fax: 713-783-0787

_/s/ Charlie T. Nhan_____

Charlie T. Nhan

Attorney-in-charge
State Bar No.: 24025561
Federal I.D.: 25296
Scott K. Bui
State Bar No. 00789185

Federal I.D.:17601

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I, Charlie T. Nhan, do hereby certify that on <u>26th day of April 2010</u>, a true and correct copy of the foregoing Motion has been filed via the Court's CM/ECF filing system and a copy has been electronically sent to Defendant's attorney of record via the Court's electronic filing system.

Thomas H. Wilson & Martin C. Luff Vinson & Elkins, L.L.P. Counsel for Defendant Via Court's CM/ECF & Via Court's Chamber Pursuant to Local Rules

/s/ Charlie T. Nhan

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IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

BICH-CHAU THI TRAN, ET AL., and on, behalf of themselves and all other employees similarly situated,

Plaintiffs,

v.

Civil Action No.: 09-CV-02653

COMPUTER TECHNOLOGY
SOLUTIONS, L.P.

JURY TRIAL DEMANDED

BICH-CHAU THI TRAN, ET AL., and SEXHIBIT B

EXHIBIT B

E

SWORN DECLARATION OF NUONG NGUYEN

Pursuant to 28 U.S.C. §1746 Nuong Nguyen declares the followings:

- 1. "My name is Nuong Nguyen. I am competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.
- 2. I am currently employed by Computer Technology Solutions, L.P. (CTS) since 2008 to the present.
- 3. I work as a tester and laptop repairer in the Apple division of CTS.
- 4. On or about February 2009 to the about July 2009, I get pay by CTS for the 'piece work' and not as hourly wages earner. Specifically, I get pay \$5.00 for each Apple laptop that I repair / test, no matter how much time it takes.
- 5. For instance, for the pay period from 2/15/09 through 2/21/09, I worked an average of about 63 hours per week (see attached Exhibit 1). For the period from 3/1/09 through 3/7/09, I worked an average of about 62 hours per week (see attached Exhibit 2). Although my actual hours worked were about 62 hours per week, the paycheck stub that I received from CTS via Gevity showed only 39.10.
- 6. Throughout my employment with CTS, I am very prompt and almost always clock-in my employee badge to report my time at the beginning of my shift; and clock-out when I

1

finish or leave the company premises at the end of my shift.

- 7. In addition to the regular Apple laptop that I tested / repaired, I also worked on Apple laptop that referred to within CTS as 'looper'.
- 8. For all of the 'looper' test / repair, I normally get a separate paycheck from a company called Computer repair / Kristi Quan Hoang / Tony T. Nguyen (see attached Exhibit 3). I always performed the 'looper' work at CTS facility and during my normal working hours. Whenever I get a check payment from Computer repair, I always have to sign my name on a spreadsheet to indicate that I receive the payment from Computer repair.
- 9. I declare under penalty of perjury that the foregoing is true and correct."

Agyun Ily Musyl

56369 Computer Technology Soluti Nuong Thi Nguyen 26-FEB-2009 Pay Date: Pay Period: 15-FEB-2009 to 21-FEB-2009 EE# 1441816-2 4949 Windfern Rd Houston TX 77041 Wage/Salary: 0.00 Federal filing: M 1 Add'1 0.00 State filing: (TX) 0 Add'1 0.00 Hrs YTD Earnings Rate Amt Deductions YTD EE Taxes Amt 20.60 20.60 Piecework 39.10 5.000 430.00 430.00 Federal Income Tax 6.23 6.23 Medicare Social Security Men 800 - 830 Ths 800 - 900 wed 800 - 645 THP 800 - 850 800-900 Message 2008 W-2 reprints are available free of charge at gevity.com. YTD Gross Gross Net Amt

THIS DOCUMENT IS PRINTED IN TWO COLORS. DO NOT ACCEPT UNLESS LIGHT AND DARK BLUE ARE PRESENT.

Gevity HR - 2800 Post Oak Blvd Suite 4100

Case 4:09-cv-02653 Document 14

56369 Computer Technology Solutions LP Piecework

Pay Date: 26-FEB-2009

Filed in TXSD on 04/26/10 Page 10 of 50

Pay Advice For: Nuong Thi Nguyen (1441816-2) 6311 Neece Drive Houston TX 77041

Bank of America

NOT A CHECK 376.51

SECURITY FEATURES INCLUDED. OF TAILS ON BACK

Not Negotiable

SIGNATURE LINE CONTAINS LOGOLINE

EXHIBIT___

Case 4:09-cv-02653 Document 14 Filed in TXSD on 04/26/10 Page 11 of 50

YTD Deductions

1.125.00

56369 Computer Technology Soluti Nuong Thi Nguyen 4949 Windfern Rd

Hrs

39.20

Earnings

Piecework

EE# 1441816-2 Wage/Salary: 0.00

390.00

Pay Date: 12-MAR-2009

Pay Period: 01-MAR-2009 to 07-MAR-2009 Add'1 0.00 Federal filing: M 1 State filing: (TX) 0 Add'1 0.00

Houston TX 77041

Rate

5.000

TD	EE Taxes	Amt	YTD
	Federal Income Tax	16.60	45.30
	Medicare	5.65	16.31
	Social Security	24.18	69.75

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Message 2008 W-2 reprints are available free of charge

at gevity.com.

YTD Gross

THIS DOCUMENT IS PRINTED IN TWO COLORS. DO NOT ACCEPT UNLESS LIGHT AND DARK BLUE ARE PRESENT.

Gevity HR - 2800 Post Oak Blvd Houston, TX 77056

Suite 4100

Houston, TX 77056 56369 Computer Technology Solutions LP Piecework

Pay Date: 12-MAR-2009

Pay Advice For: Nuong Thi Nguyen 6311 Neece Drive Houston TX 77041

(1441816-2)

Bank of America

NOT A CHECK 343.57

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Not Negotiable

SIGNATURE LINE CONTAINS LOGOLINE

EXHIBIT 2

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COMPUTER REPAIR
KRISTI QUAN HOANG
TONY T. NGUYEN
713-382-6999 713-339-0043

Pay to the order of: NUON & THI NGWEN

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Washington Mutual Bank
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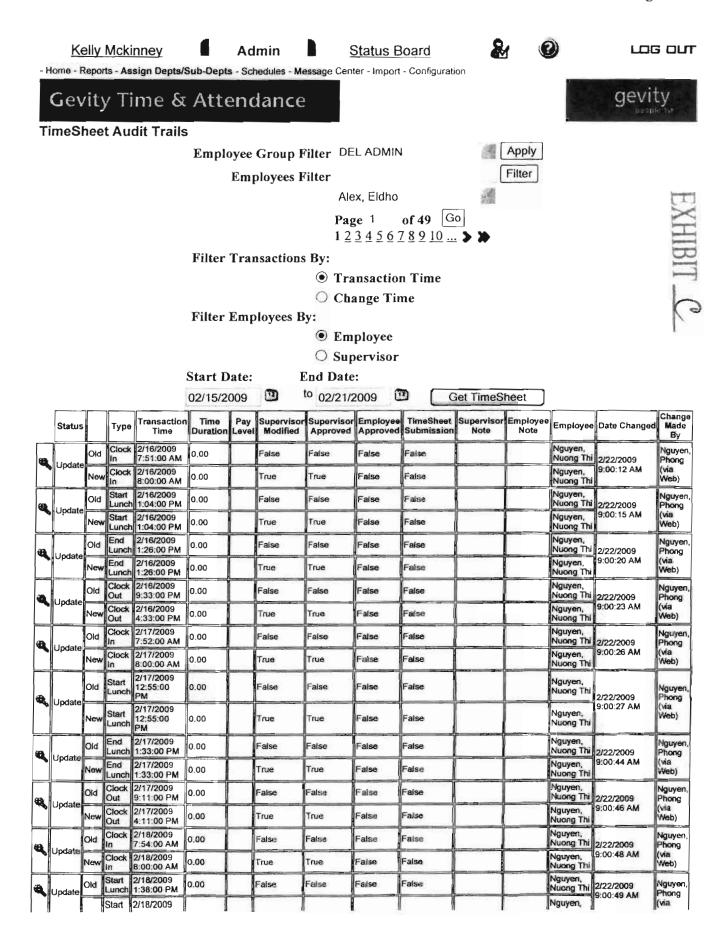
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13.62		ĺ	8:31	8:25	4/6/2009	16.72	Ĥ	8:30	8:25	8:29	82.29	8.70		20.28	0) 11/1 1000	8.29	8:26	8:26	8:25	ĺ	20.10	1	8:25	8:30		ĺ	8:25				8:38			H	Ì		22.03	i	0.00	5,77	8:00	Ì	Ü		17.42		8:00	9.52	Ü		22.95	2/20/2009	8,00	200	0 0	B.00	2/16/2009	Date	
13.62	8:76	8:28	8:31 14:04	8:25 13:56	4/6/2009 8:26	16.72	8:28	8:30 14:30	8:25 14:09	8:29 14:03	0:29 14:05	44.00		20.28	of the formation of the first o	8-29 14:00	8:26 13:55	8:26 14:09	8:25 14:02	8:26	20.10		8:25	8:30 14:30	8:28	8:27	8:25				8:35 14:14	8:26		8:23	7:58		22.03	8:00	0.00	13.03	8:00 13:28	8:00	8:00		17.42	8:00	8:00 13:56	9.52	8:00		22.95	3/20/2009 8:00	8:00 13:10	1000	1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	800 1245	2/16/2009 8:00 13:04 13:26	Date Start Time Lunch Out Lunch in	SYS
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13.62 Total	8:76 13:52	8:28 14:05 14:36	8:31 14:04 14:35	8:25 13:56 14:30	4/6/2009 8:26 14:11 14:32 0.35	16.72 Total	8:28 13:51	8:30 14:30 15:00	8:25 14:09 14:34	8:29 14:03 14:33	8:29 14:05 14:32	14.00		20.28 Total	of any account to the second second	8-29 14:00 14:32	8:26 13:55 14:31	8:26 14:09 14:36	8:25 14:02 14:33	8:26 14:29	ZU. IU Total		8:25 14:11 14:34	8:30 14:30 15:00	8:28 14:12	8:27 14:00	8:25 14:18 14:42				8:78 14:14 14:33	8:26 14:05		8:23 14:03 14:32	7:58 14:00		22.03 Total	8:00: 13:41	12.41	13.03	8:00 13:28 13:51	8:00 12:23	8:00 14:02		17.42 Total	8:00 13:58 13:25	8.00 13:56 14:21	9-52 14:26 14:58	8:00 12:20		22.95 Total	2/20/2009 8:00 13:41	8,00 13,10 13:29	13:30	8 18:48 16:07	8.00 12:55 13:33	2/16/2009 8:00 13:04 13:26 0,37	Date Start Time Lunch Out Lunch in Lunch time/in hrs.	SYSTEM CHANGE HOURS
	8:75 13:52 14:32	8:28 14:05 14:36 0.52	8:31 14:04 14:35 0.52	8:25 13:56 14:30 0.57	4/6/2009 8:26 14:11 14:32 0.35		8:28 13:51 14:34	8:30 14:30 15:00	8:25 14:09 14:34	8:29 14:03 14:33 0.50	8:29 14:05 14:32 0.45	14.05			of any account to the second second	8-29 14:00 14:32 6.53	8:26 13:55 14:31 0.60	8:26 14:09 14:36 0.45	8:25 14:02 14:33 0.52	8:26 14:29 14:57			8:25 14:11 14:34 0.38	8:30 14:30 15:00 0.50	8:28 14:12 14:43 0.52	8:27 14:00 14:32	8:25 14:18 14:42			Total	8:26 14:14 14:33 0.32	8:26 14:05 14:36	0.06	8:23 14:03 14:32 0.48	7:58 14:50 14:03			8:00 15:41 14:01	13.41 13.22	13.03	8:(0) 13:28 13:51 0.38	8:00 12:23 13:00 0.62	8:00 14:02 14:43		Total	8:00 13:58 13:25 0.45	8:00 13:56 14:21 0.42	9-52 14:26 14:58 0.53	8:00 12:20 12:52			3/20/2009 8:00 13:41 14:12	8,00 13,10 13:29 0.32	13:30 14:02	8 12 18 12 12 12 12 12 12 12 12 12 12 12 12 12	8.00 12:55 13:53 0.63	2/16/2009 8:00 13:04 13:26 0,37 16:33	Date Start Time Lunch Out Lunch in Lunch time/in hrs. Out Time	SYSTEM CHANGE HOURS
	8:76 13:52 14:32 0.67	8:28 14:05 14:36 0.52 17:00	8:31 14:04 14:35 0.52 17:00	8:25 13:56 14:30 0.57 17:00	4/6/2009 8:26 14:11 14:32 0.35 17:00		8:28 13:51 14:34 0,72	8:30 14:30 15:00 0.50 17:00	8:25 14:09 14:34 0.42 17:00	8:29 14:03 14:33 0.50 17:00	8:29 14:05 14:32 0.45 17:00	14.00			2) 11 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	8:29 14:00 14:32 0.53	8:26 13:55 14:31 0.60	8:26 14:09 14:36 0.45 16:18	8:25 14:02 14:33 0.52 17:00	8:26 14:29 14:57 0.47			8:25 14:11 14:34 0.38 17:05	8:30 14:30 15:00 0.50 17:00	8:28 14:12 14:43 0.52 16:45	8:27 14:00 14:32 0.53	8:25 14:18 14:42 0.40 17:00		d depoint	Total	8:26 14:14 14:33 0.32 16:14	8:26 14:05 14:36 0.52 16:35	0.06	8:23 14:03 14:32 0.48 17:00	7:58 14:50 14:03 0.05			8:00 15:41 14:01 0:33	13.41 14.01	13:03 13:00	8:02 13:28 13:51 0.38 16:58	8:00 12:23 13:00 0,62 16:09	8:00 14:02 14:43 0.58		Total	8:00 13:58 13:25 0.45 16:58	8:00 13:56 14:21 0.42 18:06	9-52 14:26 14:58 0.53 17:32	8:00 12:20 12:52 0.53			2/20/2009 8:00 13:41 14:12 0.52	8,00 13:10 13:29 0.32 16:34	15:20 14:02 0.40 16:26	8 16-17 0 A	200 12:55 13:33 0.63	2/16/2009 8:00 13:04 13:26 0,37 16:33	Date Start Time Lunch Out Lunch in Lunch time/in hrs.	SYSTEM CHANGE HOURS

Total Worked Hours
7:28
7:35
8:06
7:37
8:12
7:32
8:03
0.00
32:20



		New	Lunch	1:38:00 PM	0.00	True	True	False	False	Nuong Thi		(Web)
A	Update	Old	End Lunch	2/18/2009 2:02:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi		Nguyer Phong
	Орчан	New	End Lunch	2/18/2009 2:02:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	9:00:50 AM	(via Web)
æ.	Update	Old	Clock Out	2/18/2009 6:46:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	2/22/2009	Nguyer
•	Ориале	New	Clack Out	2/18/2009 4:26:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	9:00:51 AM	(via Web)
6	Update	Old	Clock In	2/19/2009 7:53:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	2/22/2009	Nguyen
	Opuale	New	Clock In	2/19/2009 8:00:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	9:00:52 AM	(via Web)
E	Update	Old	Start Lunch	2/19/2009 1:10:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	2/22/2009	Nguyen
-0	Opuale	New	Start Lunch	2/19/2009 1:10:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	9:00:53 AM	(via Web)
Q	Update	Old	End Lunch	2/19/2009 1:29:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	2/22/2009	Nguyen Phong
-0	Opdate	New	End Lunch	2/19/2009 1:29:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	9:00:53 AM	(via Web)
da.	Update	Old	Clock Out	2/19/2009 8:34:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	2/22/2009	Nguyen Phong
	Opdate	New	Clock Out	2/19/2009 4:34:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	9:00:54 AM	(via Web)
6	Update	Old	Clock In	2/20/2009 7:53:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	2/22/2009	Nguyen Phong
-	upuate	New	Clock In	2/20/2009 8:00:00 AM	0.001	True	True	False	False	Nguyen, Nuong Thi	9:00:54 AM	(via Web)
A.	Update	Old	Start Lunch	2/20/2009 1:41:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi		Nguyen, Phong
9	Opuate	New	Start Lunch	2/20/2009 1:41:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	9:00:55 AM	(via Web)
a.	Update	Old	End Lunch	2/20/2009 2:12:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	2/22/2009	Nguyen, Phong
9	Opdate	New	End Lunch	2/20/2009 2:12:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	9:00:56 AM	(via Web)
a.	Update	Old	Clock Out	2/20/2009 10:02:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi		Nguyen, Phong
		New.	Clock Out	2/20/2009 4:02:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	9:00:57 AM	(via Web)
B _o	Delete	Old	Clock In	2/21/2009 7:24:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	2/22/2009 8:59:24 AM	Nguyen, Nuong Thi (via
		New										Web)
2	Delete	Old		2/21/2009 7:46:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	2/22/2009 8:59:24 AM	Nguyen, Nuong Thi (via
	1	New									5.55.E 7 7 Har	Web)

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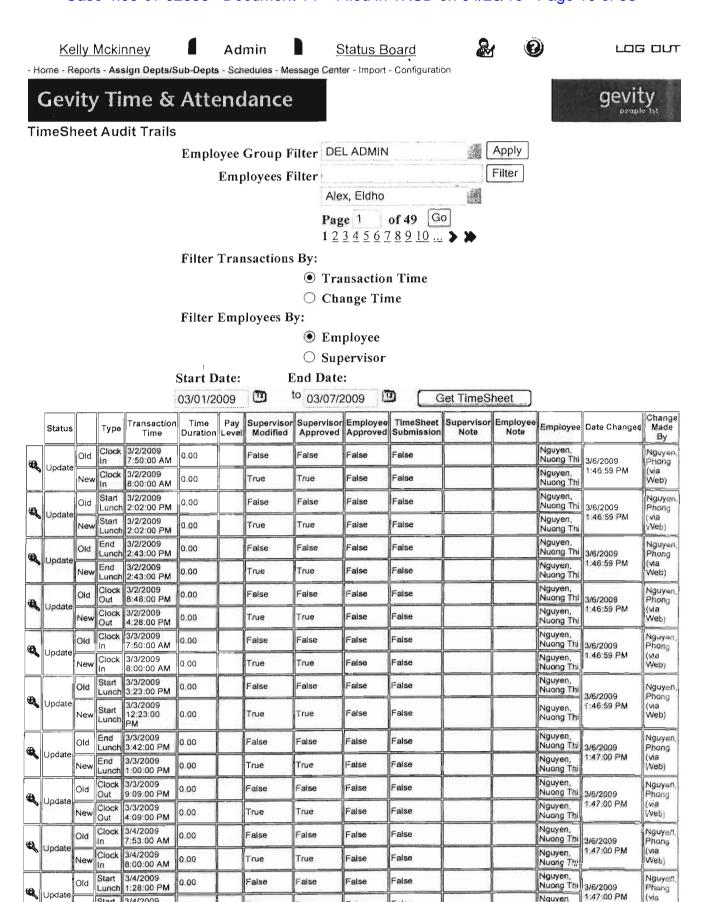
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	Status		Туре	Transaction Time	Time Duration	Pay Level	Supervisor Modified		Employee Approved	TimeSheet Submission	Supervisor Note	Note	Employee	Date Changed	Made By
83	Update	Old	Clock in	7:52:00 AM	0.00		False	False	False	False			Nguyen, Nuong Thi		Nguyen Phong
	Opulato	New	Clock	2/23/2009 8:00:00 AM	0.00		True	True	False	False			Nguyen, Nuong Thi	10;38;10 AM	(via Web)
EQ.	Update	Old	Start Lunch	PM	0.00		False	False	False	False			Nguyen, Nuong Thi	3/1/2009	Nguyen Phong
_		New	Start Lunch	PM	0.00		True	True	False	False			Nguyen, Nuong Thi	10:38:11 AM	(via Web)
•	Update	Old	End Lunch	PM	0.00		False	False	False	False			Nguyen, Nuong Thi	3/1/2009 10:38:11 AM	Nguyen, Phong (via
		New	End Lunch	2/23/2009 12:52:00 PM	0.00		True	True	Faise	False			Nguyen, Nuong Thi		Web)
6		Old	Clock	2/23/2009 9:36:00 PM	0.00		False	False	False	False			Nguyen, Nuong Thi	3/1/2009	Nguyen, Phong
4	Update	New	Clock	2/23/2009 5:36:00 PM	0.00		True	True	Faise	False			Nguyen, Nuong Thi	10:38:11 AM	(via Web)
•		Old	Clock	2/24/2009 7:54:00 AM	0.00		False	False	False	False			Nguyen, Nuong Thi	3/1/2009	Nguyen, Nuong
	Delete	New												10:37:13 AM	Thi (via Web)
8	Delete	Old	Clock	2/24/2009 9:14:00 AM	0.00		False	False	False	False			Nguyen, Nuong Thi	3/1/2009	Nguyen, Nuong
	Beiete	New												10:37:13 AM	Thi (via Web)
42	Update.	Old	Clock In	2/24/2009 9:52:00 AM	0.00		False	False	False	False			Nguyen, Nuong Thi	3/1/2009	Nguyen, Phong
	Opdate	New	Clock In	2/24/2009 9:52:00 AM	0.00		True	True	False	False			Nguyen, Nuong Thi	10:38:11 AM	(via Web)
2	المعادات	Old	Start Lunch	2/24/2009 2:26:00 PM	0.00		False	False	False	False			Nguyen, Nuong Thi	3/1/2009	Nguyen, Phong
	Update:	New	Start Lunch	2/24/2009 2:26:00 PM	0.00		True	True	False	False			Nguyen, Nuong Thi	10:38:11 AM	(via Web)
_		Old	End Lunch	2/24/2009 2:58:00 PM	0.00		False	False	False	False			Nguyen, Nuong Thi	3/1/2009	Nguyen, Phong
40	Update	New	End	2/24/2009 2:58:00 PM	0.00		True	True	False	False			Nguyen, Nuong Thi	10:38:11 AM	(via Web)

Đ,	Update	New	Clock Out	2/24/2009 5:32:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:38:11 AM	(via Web)
Ø,	Update	Old	Clock In	2/26/2009 7:50:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/1/2009	Nguyen. Phong
	Opdate	New	Clock	2/26/2009 8.00:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:38:11 AM	(via Web)
æ.	Update	Old	Start Lunch	2/26/2009 1:56:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/1/2009	Nguyen Phong
	Opdate	New		2/26/2009 1:56:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:38:11 AM	(via Web)
₹	Lladata	Old	E.nd Lunch	2/26/2009 2:21:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/1/2009	Nguyen, Phong
	Update	New	End Lunch	2/26/2009 2:21:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:38:11 AM	(via Web)
e a		Old	Clock Out	2/26/2009 9:06:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/1/2009	Nguyen, Phong
	Update	New		2/26/2009 6:06:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:38:11 AM	(via Web)
6	Update	Old	Clock In	2/27/2009 7:51:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/1/2009	Nguyen, Phong
79	Opdate	New	Clock In	2/27/2009 8:00:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:38:11 AM	(via Web)
6		Old	Start Lunch	2/27/2009 12:58:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/1/2009	Nguyen, Phong
•	Update	New	Start Lunch	2/27/2009 12:58:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:38:11 AM	(via Web)
4		Old	End Lunch	2/27/2009 1:25:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/1/2009	Nguyen, Phong
	Update	New	End Lunch	2/27/2009 1:25:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:38:11 AM	(via Web)
33	1 1	Old		2/27/2009 8:58:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/1/2009	Nguyen, Phong
•	Update	New		2/27/2009 4:58:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:38:11 AM	(vial Web)

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https://gevitytime.centralservers6.com/cs/TimeSheetTracking.asp?StartDate=3/1/2009&End... 4/6/2010

False

True

True

False

Nguyen, Nuong Thi

1:47:00 PM

Upda

Start

3/4/2009

Lunch 1:28:00 PM

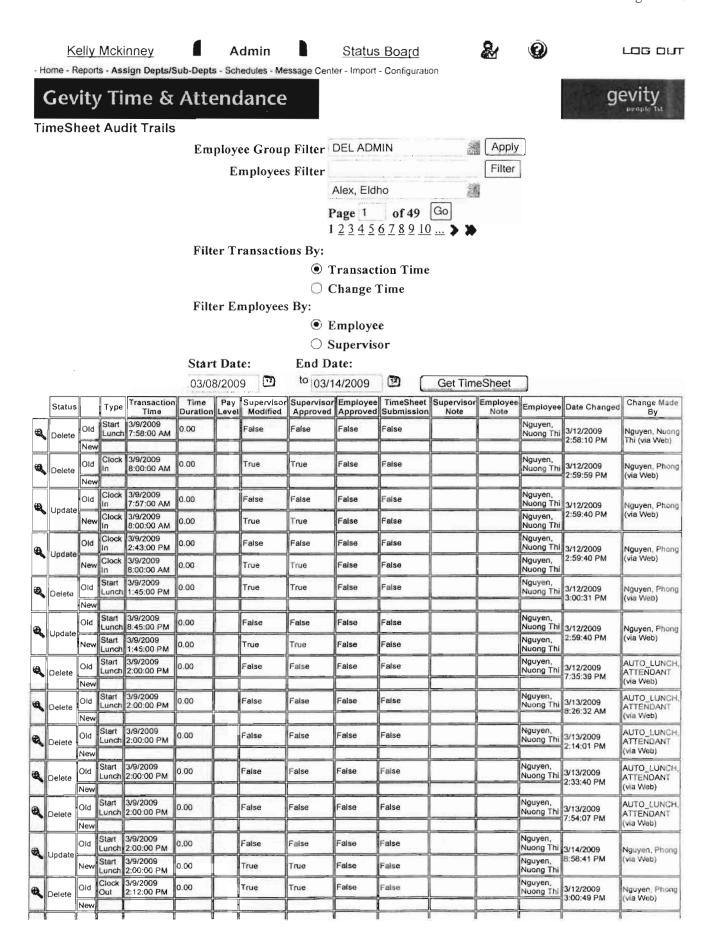
0.00

a	l lodate	Old	End Lunch	3/4/2009 1:51:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/6/2009	Nguyen, Phong
	Update	New	End Lunch	3/4/2009 1:51:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	1:47:00 PM	(via Web)
	Update	Old	Clock Out	3/4/2009 8:58:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/6/2009	Nguyen, Phong
	Ориале	New	Clock Out	3/4/2009 4:58:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	1:47:00 PM	(via Web)
B	Update	Old	Clock In	3/5/2009 7:51:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi		Nguyen, Phong
	Opudio	New	Clock In	3/5/2009 8:00:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	1:47:00 PM	(via Web)
4	Update	Old	Start Lunch	3/5/2009 1:03:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/6/2009	Nguyen, Phong
	Opcialo	New	Start Lunch	3/5/2009 1:03:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	1:47:00 PM	(via Web)
a .	Update	Old	End Lunch	3/5/2009 1:29:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/6/2009	Nguyen, Phong
	Opuate	New	End Lunch	3/5/2009 1:29:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	1:47:00 PM	(via Web)
Q	Update	Old	Clock Out	3/5/2009 7:04:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/6/2009	Nguyen, Phong
	Opdate	New	Clock Out	3/5/2009 4:04:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	1:47:00 PM	(via Web)
Q	Update	Old	Clock In	3/6/2009 7:52:00 AM	0.00	False	False	Faise	False	Nguyen, Nuong Thi	3/6/2009	Nguyen, Phong
_	Орцаге	New	Clock In	3/6/2009 8:00:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	1:47:00 PM	(via Web)
a	Update	Old	Start Lunch	3/6/2009 1:41:00 PM	0.00 ⁱ	False	False	False	False	Nguyen, Nuong Thi	3/6/2009	Nguyen. Phong
*	Opdate	New	Start Lunch	3/6/2009 1:41:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	1:47:00 PM	(via Web)
æ.	Update	Old	Start Lunch	3/6/2009 1:41:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	3/6/2009	Nguyen, Phong
•	Ориале	New	Start Lunch	3/6/2009 1:41:00 PM	0.00	True	False	False	False	Nguyen, Nuong Thi	1:47:00 PM	(via Web)
۵,	Update	Old	Start Lunch	3/6/2009 1:41:00 PM	0.00	True	False	False	False	Nguyen, Nuong Thi	3/7/2009	Nguyen, Phong
•	Opuate	New	Start Lunch	3/6/2009 1:41:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	11:42:45 AM	(via Web)
Đ,	Update		End Lunch	3/6/2009 2:01:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/7/2009	Nguyen, Phong
•	Opdate		End Lunch	3/6/2009 2:01:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	11:42:45 AM	(via Web)
Đ.	Update		Clock Out	3/6/2009 9:17:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/7/2009	Nguyen, Phong
*	Opuate			3/6/2009 4:17:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	11:42:45 AM	(via Web)

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CTS 001518

 $https://gevitytime.centralservers 6.com/cs/TimeSheet Tracking.asp? StartDate = 3/1/2009 \& End... \ \ 4/6/2010 + 1/2009 \& End... \ \ A/6/2010 + 1/2009 \& E$



æ		Old	Clock	3/9/2009 2:12:00 PM	0.00	F	alse	False	False	False ,		Nguyen, Nuong Thi	3/12/2009	Nguyen, Phor
~	Update	Nev	Clock	3/9/2009 2:12:00 PM	0.00	Т	rue	True	False	False		Nguyen, Nuong Thi	2:59:40 PM	(via Web)
B,	Delete	Old	End Lunch	3/9/2009 2:15.00 PM	0.00	Т	rue	True	False	False		Nguyen, Nuong Thi	3/12/2009 3:01:13 PM	Nguyen, Phon
		Nev	-	3/9/2009				ļ				Name	3.01.13 FW	(VIA VVED)
Œ.	Update	Old	End Lunch	9:15:00 PM	0.00	Т	rue	False	False	False		Nguyen, Nuong Thi	3/12/2009	Nguyen, Phor
_	Оравка	Nev	End Lunch	3/9/2009 2:15:00 PM	0.00	Т	rue	True	False	False		Nguyen, Nuong Thi	2:59:40 PM	(via Web)
æ,	Delete	Old		3/9/2009 2:30:00 PM	0.00	F	alse	False	False	False		Nguyen, Nuong Thi	3/12/2009 7:35:39 PM	AUTO_LUNC
_		Nev	End	3/9/2009					-		-	Nguyen,		(via Web)
æ,	Delete	Old	Lunch		0.00	F	alse	False	False	False	<u> </u>	Nuong Thi	3/13/2009 8:26:32 AM	AUTO_LUNC ATTENDANT (via Web)
a	Delete	Old	End Lunch	3/9/2009 2:30:00 PM	0.00	F	alse	False	False	False		Nguyen, Nuong Thi	3/13/2009	AUTO_LUNC
_	Deleto	New											2:14:01 PM	(via Web)
Ø,	Delete	Old	End	3/9/2009 2:30:00 PM	0.00	F	alse	False	False	False		Nguyen, Nuong Thi	3/13/2009 2:33:40 PM	AUTO_LUNC ATTENDANT (via Web)
		New	End	3/9/2009	0 00		nlan	False	Entro	False		Nguyen,	-	AUTO LUNC
A.	Delete	Old		2:30:00 PM	1 000		alse	raise	Faise	False	 	Nuong Thi	3/13/2009 7:54:07 PM	ATTENDANT (via Web)
//a		Old	End Lunch	3/9/2009 2:30:00 PM	0.00	F	alse	False	False	False		Nguyen, Nuong Thi	3/14/2009	Alguno Dha
a	Update	New	End Lunch	3/9/2009 2:30:00 PM	0.00	T	rue	False	False	False		Nguyen, Nuong Thi	8:58:41 PM	Nguyen, Phor (via Web)
		Old	End Lunch	3/9/2009 2:30:00 PM	0.00	Т	rue	False	False	False		Nguyen,	3/14/2009	
H.	Update	New	End	3/9/2009 2:30:00 PM	0.00	T	rue	True	False	False		Nguyen, Nuong Thi	8:58:41 PM	Nguyen, Phor (via Web)
		Old	Clock	3/9/2009 9:39:00 PM	0.00	F	alse	False	Faise	False		Nguyen, Nuong Thi		
	Update	New	Clock	3/9/2009 4:39:00 PM	0.00	Т	rue	True	False	False		Nguyen, Nuong Thi	3/12/2009 2:59:40 PM	Nguyen, Phor (via Web)
a		Old	Start	3/9/2009 8:45:00 PM	0.00	F	alse	False	False	False		Nguyen, Nuong Thi	3/10/2009	AUTO_LUNC
-0	Delete	New	-	0.43.00 F M								Trucking 13th	8:23:21 AM	(via Web)
	Delete	Old	Start Lunch	3/9/2009 8:45:00 PM	0.00	F	alse	False	False	False		Nguyen, Nuong Thi	3/10/2009 2:03:16 PM	AUTO_LUNC ATTENDANT
		New	Ctod	3/9/2009								Nguyen,		(via Web)
4	Delete	Old	Start Lunch	8:45:00 PM	0.00	F	alse	False	False	False		Nuong Thi	3/10/2009 2:32:29 PM	AUTO_LUNC ATTENDANT (via Web)
		New	Start	3/9/2009	0.00		alse	False	False	False		Nguyen,		AUTO LUNC
2	Delete	New	Lunch	8:45:00 PM	0.00		dise	raise	r alse	raise		Nuong Thi	3/10/2009 9:37:08 PM	ATTENDANT (via Web)
A	Delete	Old		3/9/2009 8:45:00 PM	0.00	Fa	alse	False	False	False		Nguyen, Nuong Thi	3/11/2009	AUTO_LUNC
		New					100						3:05:14 PM	(via Web)
2	Delete	Old	Start Lunch	3/9/2009 8:45:00 PM	0.00	Fa	alse	False	False	False		Nguyen, Nuong Thi	3/11/2009 6:55:28 PM	AUTO_LUNC ATTENDANT (via Web)
4		New	Start	3/9/2009		-			6			Nguyen,		AUTO_LUNC
D .	Delete	Old	Lunch	8:45:00 PM	0.00	Fa	alse	False	False	False		Nuong Thi	3/11/2009 6:56:36 PM	ATTENDANT (via Web)
2	Delete	Old		3/9/2009 8:45:00 PM	0.00	Fa	alse	False	False	False		Nguyen, Nuong Thi	3/12/2009	AUTO_LUNCI
_		New	Start	3/9/2009								Nguyen,	8:26:30 AM	(via Web)
	Delete	Old		8:45:00 PM	0.00	Fa	ulse	False	False	False		Nuong Thi	3/12/2009 2:05:14 PM	ATTENDANT (via Web)
2		Old		3/9/2009 8:45:00 PM	0.00	Fa	else	Faise	False	False		Nguyen, Nuong Thi	3/12/2009	AUTO_LUNC
•	Delete	New											2:36:03 PM	(via Web)
À	Delete	Old		3/9/2009 8:45:00 PM	0.00	Fa	ilse	False	False	False		Nguyen, Nuong Thi	3/12/2009 2:58:10 PM	AUTO_LUNC
_		New	Slort	3/9/2009										(via Web)
	Delete	Old New		8:45:00 PM	0.00	Fa	ijse	False	False	False		Nguyen, Nuong Thi	3/12/2009 2:58:30 PM	AUTO_LUNCI (ATTENDANT (via Web)
- -			End	3/9/2009	0.00		dao	Color	Calca	Cole		Nguyen,		
	1	Old		9:15.00 PM	0.00	Fa	lse	False	False	False		Nuong Thi	3/10/2009	AUTO_LUNC

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Ð,	Delete	Nev	,								8:23:21 AM	ATTENDANT (via Web)
•	Delete	Old	End	3/9/2009 9:15:00 PM	0.00	False	False	False	False	Nguyen, Nuong Th	3/10/2009 2:03:16 PM	AUTO_LUNC
		New	1	0.0.0000							2.00.101101	(via Web)
Œ,	Delete	Old	End Lunch	3/9/2009 9:15:00 PM	0 00	False	False	False	False	Nguyen, Nuong Th	3/10/2009 2:32:29 PM	AUTO_LUNG ATTENDANT (via Web)
	Delete	Old	End	3/9/2009 9:15:00 PM	0.00	False	False	False	False	Nguyen, Nuong Th	3/10/2009 9:37:08 PM	AUTO_LUNC
E	Delete	Old	End Lunch	3/9/2009 9:15:00 PM	0.00	False	False	False	False	Nguyen, Nuong Th		(via Web)
_	Delete	New	-	3/9/2009						Nguyen,	3:05:14 PM	(via Web)
B	Delete	Old	Lunch		0.00	False	Faise	False	False	Nuong Th	3/11/2009 6:55:28 PM	AUTO_LUNC ATTENDANT (via Web)
	Delete	Old	End Lunch	3/9/2009 9:15.00 PM	0.00	False	Faise	False	False	Nguyen, Nuong Th	3/11/2009 6:56:36 PM	AUTO_LUNG ATTENDANT (via Web)
Q	Defete	Old	End Lunch	3/9/2009 9:15.00 PM	0.00	False	False	False	False	Nguyen, Nuong Th	3/12/2009 8:26:30 AM	AUTO_LUNC ATTENDANT (via Web)
E	Delete	Old	End Lunch	3/9/2009 9:15:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/12/2009	AUTO_LUNC
		New	End	3/9/2009						Mountag	2:05:14 PM	(via Web)
4	Delete	Old		9:15:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/12/2009 2:36:03 PM	AUTO_LUNC ATTENDANT (via Web)
0	Delete	Old	End Lunch	3/9/2009 9:15:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/12/2009 2:58:10 PM	AUTO_LUNC ATTENDANT (via Web)
eq.	Delete	Old	End Lunch	3/9/2009 9:15:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/12/2009 2:58:30 PM	AUTO_LUNC
_		New Old	End Lunch	3/9/2009 9:15:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi		(via Web)
2	Update	New	End	3/9/2009 9:15:00 PM	0.00	True	False	False	False	Nguyen, Nuong Thi	2:59:40 PM	(via Web)
2	Update	Old	Clock In Clock	3/10/2009 8:23:00 AM 3/10/2009	0.00	False	False	False	False	Nguyen, Nuong Thi Nguyen,	3/12/2009 2:59:40 PM	Nguyen, Pho (via Web)
		New	In Start Lunch	8:23:00 AM 3/10/2009 2:03:00 PM	0.00	True	True	False	False False	Nuong Thi Nguyen,	3/12/2009	Algunia Stra
A.	Update	New	Start Lunch	3/10/2009 2:03:00 PM	0.00	True	True	False	False	Ngayen, Nuong Thi	:2:59:40 PM	Nguyen, Pho (via Web)
a.	Update	Old	End Lunch End	3/10/2009 2:32:00 PM 3/10/2009	0.00	False	False	False	False	Nguyen, Nuong Thi Nguyen,	3/12/2009 2:59:40 PM	Nguyen, Pho (via Web)
			Lunch	2:32:00 PM 3/10/2009 9:37:00 PM	0.00	True False	True False	False	False False	Nuong Thi Nguyen,		
A.	Update =	New		3/10/2009 5:00:00 PM	0.00	1/rue	True	False	False	Nuong Thi Nguyeri, Nuong Thi	2:59:40 PM	Nguyen, Pho (via Web)
à	Update	Ola	In	3/11/2009 3:05:00 PM 3/11/2009	0.00	False	False	False	False	Nguyen, Nuong Thi Nguyen,	3/12/2009 2:59:40 PM	Nguyen, Pho
		New	In Start	3/11/2009 3/11/2009 2:00:00 PM	0.00	False	True	False	False False	Nuong Thi Nguyen, Nuong Thi	3/12/2009	AUTO_LUNC
3	Delete L	New		2/11/2000						Nguyen	2:59:59 PM	ATTENDANT (via Web)
6	Delete		Lunch	2:00:00 PM	0.00	False	False	False	False	Nuong Thi	3/12/2009 3:00:31 PM	ATTENDANT (via Web)
6	Delete			3/11/2009 2:00:00 PM	0.00	False	False	Falise	False:	Nguyen, Nuong Thi	3/12/2009 3:00:49 PM	AUTO_LUNC ATTENDANT (Ma Web)
	Delete	Dia		3/11/2009 2:00:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/12/2009 3:01:13 PM	AUTO_LUNC ATTENDANT (via Web)
				3/11/2009 2:00:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/12/2009	AUTO_LUNCI
	1	New	Start	3/11/2009	0.00	False	Failse:	False	False	Nguyen,	7:35:39 PM	(via vveb)
0	Delete	710	unch	2:00:00 PM	0.00	Laise	atue:	, giác	, case	Nisoner Thi	3/13/2009	ATTENDANT

_		Nev	v.									8:26:32 AM	(via Web)
2	Delete		Lunci	3/11/2009 2:00:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	3/13/2009 2:14:01 PM	AUTO_LUNC
	 	Nev	Start	3/11/2009	0.00	- L	Esta	F-11-1		-	Nguyen,		(via Web)
	Delete	Nev	Lunci	2:00.00 PM	0.00	False	False	False	False		Nuong Thi	3/13/2009 2:33:40 PM	ATTENDANT (via Web)
a		Old	Start	3/11/2009 2:00:00 PM	0.00	False	False	False	False		Nguyen,	3/13/2009	AUTO_LUNC
2	Delete	Nev		2.00.00 PM							Nuong Thi	7:54:07 PM	(via Web)
2		Old	Start	3/11/2009 2:00:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	3/14/2009	Nguyen, Pho
•	Update	Nev	Start	3/11/2009 2:00:00 PM	0.00	True	True	False	False		Nguyen, Nuong Thi	8:58:41 PM	(via Web)
Đ,		Old	End	3/11/2009 2.30;00 PM	0.00	False	False	False	False		Nguyen,	3/12/2009	AUTO_LUNC
70	Delete	Nev		2.30.00 FW				+			Nuong Thi	2:59:59 PM	(via Web)
2	Deiete	Old	End	3/11/2009 2:30:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	3/12/2009	AUTO_LUNG
_		Nev	1									3:00:31 PM	(via Web)
Đ,	Delete	Old	End Lunch	3/11/2009 2:30:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	3/12/2009 3:00:49 PM	AUTO_LUNC
		New	End	3/11/2009							Nguyen,	3.00.49 FM	(via Web)
A,	Delete	Old	Lunch	2:30:00 PM	0.00	False	False	False	False		Nuong Thi	3/12/2009 3:01:13 PM	AUTO_LUNC
_		New	End	3/11/2009	0.00	False	False	False	False		Nguyen,		(via Web)
A	Delete	New	Lunch	2:30:00 PM	0.00	l alse	T disc	T arse	T disc		Nuong Thi	3/12/2009 7:35:39 PM	ATTENDANT (via Web)
a	Delete	Old	End Lunch	3/11/2009 2:30:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	3/13/2009	AUTO_LUNG
-	Delete	New	Cunci	2.50.00 1 141							Ivaorig (til	8:26:32 AM	(via Web)
R	Delete	Old	End Lunch	3/11/2009 2:30:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	3/13/2009	AUTO_LUNC
		New	[04440000								2:14:01 PM	(via Web)
4	Delete	Old	End Lunch	3/11/2009 2:30:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	3/13/2009 2:33:40 PM	AUTO_LUNC ATTENDANT
		New	End	3/11/2009			-	-		1	Nguyen,	2.00.10	(via Web)
2	Delete	Old	Lunch	2:30:00 PM	0.00	False	False	False	False		Nuong Thi	3/13/2009 7:54:07 PM	ATTENDANT (via Web)
7		Old	End	3/11/2009	0.00	False	False	False	False		Nguyen,		(marriar)
R.	Update	New	Lunch End	2:30:00 PM 3/11/2009	0.00	True	False	False	False		Nuong Thi Nguyen,	3/14/2009 8:58:41 PM	Nguyen, Phor (via Web)
7			Lunch	2:30:00 PM 3/11/2009				1		-	Nuong Thi		-
1	Update	Old	Lunch	2:30:00 PM 3/11/2009	0.00	True	False	False	False			3/14/2009 8:58:41 PM	Nguyen, Phon (via Web)
		New	Lunch	2:30:00 PM 3/11/2009	0.00	True	True	False	False		Nuong Thi		
2	Update	Old	Out	6:56:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi		Nguyen, Phon
		New		3/11/2009 4:16:00 PM	0.00	True	True	False	False		Nguyen, Nuong Thi	2:59:40 PM	(via Web)
2	Delete	Old		3/11/2009 6:55:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	3/12/2009	Nguyen, Nuon
-7		New	01-11	0400000								2:58:30 PM	Thi (via VVeb)
	Update	Old	In	8:26:00 AM	0.00	False	False	False	False		Nguyen, Nuong Thi		Nguyen, Phon
		New	Clock	3/12/2009 8:26:00 AM	0.00	True	True	False	False		Nguyen, Nuong Thi	2:59:40 PM	(via Web)
		Old		3/12/2009 2:05:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	3/12/2009	Nguyen, Phon
0	Jpdate	New		3/12/2009 2:05:00 PM	0.00	True	True	False	False			2:59:40 PM	(via Web)
T		Old	End	3/12/2009	0.00	False	False	False	False		Nguyen,		
6	Jpdate	New	End :	3/12/2009	0.00	True	True	False	False		linga jan,	3/12/2009 2:59:41 PM	Nguyen, Phon (via Web)
+				2:36:00 PM			1300	-			Nuong Thi Nguyen,		ļ
	Jpdate	Old	Lunch	2:36:00 PM	0.00	True	True	False	False		Nuong Thi	3/12/2009 2:59:41 PM	Nguyen, Phon (via Web)
		New	Lunch :	2:36:00 PM	0.00	True	False	False	False		Nuong Thi		(1.0.7100)
4			End :	3/12/2009	0.00	True	False	False	False		Nguyen,		
	pdate	Old	Lunch :	2:36:00 PM	0.00	ride		1 0.00				3/14/2009 8:58:42 PM	Nguyen, Phone (via Web)

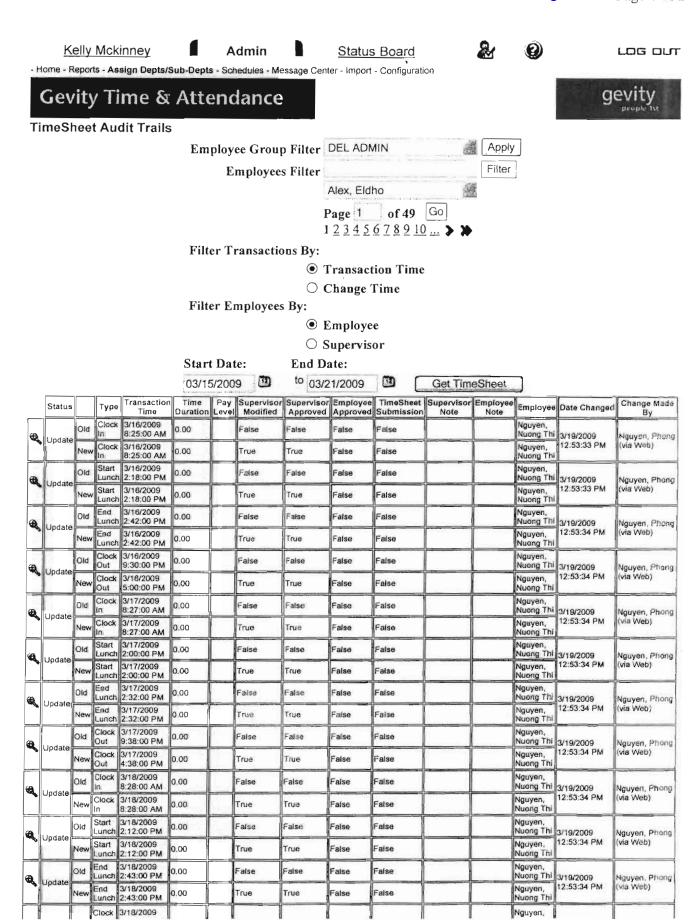
https://gevity time.centralservers 6.com/cs/TimeSheet Tracking.asp? StartDate = 3/8/2009 & End... 4/6/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 + 1/2010 +

Time Sheet Audit Trail Case 4:09-cv-02653 Document 14 Filed in TXSD on 04/26/10 Page 25 of 50 of 5

82	Update	Ою	Clack Out	3/12/2009 7:35:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/14/2009	Nguyen, Phong
	Space	New		3/12/2009 4:35:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	8:58:42 PM	(via Web)
Q	Update	Old	Clock In	3/13/2009 8:26:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/14/2009	Nguyen, Phong
•	Орчане	New	Clock In	3/13/2009 8:26:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	8:58:42 PM	(via Web)
4	Update	Old		3/13/2009 2:14:00 PM	0.00	Faise	False	False	False	Nguyen, Nuong Thi	3/14/2009	Nguyen, Phong
	Ориале	New		3/13/2009 2:14:00 PM	0.00	True	True	False	False		8:58:42 PM	(via Web)
2	Update	Old		3/13/2009 2:33:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/14/2009	Nguyen, Phong
•	Cpuale	Nau		3/13/2009 2:33:00 PM	0.00	True	True	False	Faise	Nguyen, Nuong Thi	8:58:42 PM	(via Web)
2	Update	Old		3/13/2009 7:54:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/14/2009	Nguyen, Phong
	Орчане	New		3/13/2009 4:14:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	8.58.42 PM	(via Web)

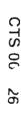
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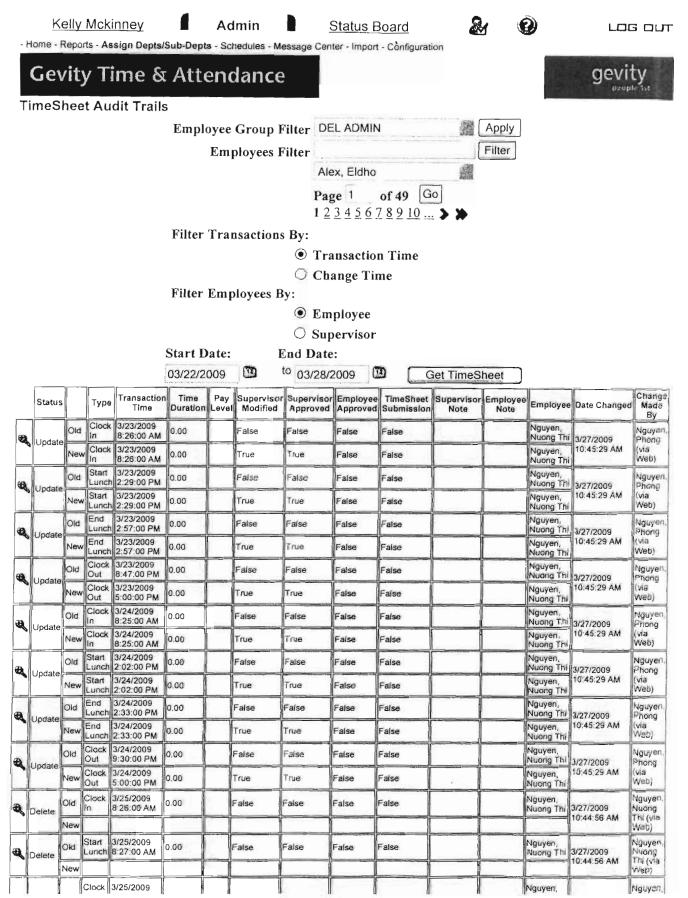
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Đ,	Update	Old	Out	8:45:00 PM 3/18/2009	0.00	False	False	False	False	Nuong Thi Nguyen,	3/19/2009 12:53:34 PM	Nguyen, Phone
		New	Out	4:45:00 PM	0.00	True	True	False	False	Nuong Thi	12.53.54 FM	(via vveb)
æ,	Update	Old	Clock	3/19/2009 8:30:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	lat tarmen	Nguyen, Phon
0	Орагае	New	Clock In	3/19/2009 8:30:00 AM	0.00	True	False	False	False	Nguyen, Nuong Thi	12:53:34 PM	(via Web)
æ	Update	Old	Clock In	3/19/2009 8:30:00 AM	0.00	True	False	False	False	Nguyen, Nuong Thi		Nguyen, Phon
	Spanio	New	Clock In	3/19/2009 8:30:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	12:17:03 AM	(via Web)
E S	Delete	Old	Start	3/19/2009 2:30:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/20/2009 8:25:16 AM	AUTO_LUNCH ATTENDANT (via Web)
B.	Delete	Old	Start Lunch	3/19/2009 2:30:00 PM	0.00	False	False	False	False	Nguyen. Nuong Thi	3/20/2009	AUTO_LUNCH
		New									2:11:06 PM	(via Web)
A	Delete	Old	Start Lunch	3/19/2009 2:30:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/20/2009 2:34:52 PM	AUTO_LUNCH ATTENDANT (via Web)
eg.	Delete	Old	Start Lunch	3/19/2009 2:30:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/20/2009	AUTO_LUNCH ATTENDANT
		New									7:05:53 PM	(via Web)
B	Update	Old	Start Lunch	3/19/2009 2:30:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/21/2009	Nguyen, Phong
9	Opdate	New	Start Lunch	3/19/2009 2:30:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	12:17:03 AM	(via Web)
2	Delete	Oid	End Lunch	3/19/2009 3:00:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/20/2009 8:25:16 AM	AUTO_LUNCH
		New									6.25.16 AW	(via Web)
2	Delete	Old	End Lunch	3/19/2009 3:00:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/20/2009 2:11:06 PM	AUTO_LUNCH
\dashv		New	End	3/19/2009				-		Nguyen,		(via Web)
Ð.,	Delete	Old		3:00:00 PM	0.00	False	False	False	False	Nuong Thi	3/20/2009 2:34:52 PM	AUTO_LUNCH ATTENDANT (via Web)
			Eno	3/19/2009	0.00	Calan	Color	Calco	False	Nguyen,		AUTO LUNCH
2	Delete	Old	Lunch	3:00:00 PM	0.00	False	False	False	Paise	Nuong Thi	3/20/2009 7:05:53 PM	ATTENDANT (via Web)
B		Old	End Lunch	3/19/2009 3:00:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/21/2009	Nguyen, Phone
	Update	New		3/19/2009 3:00:00 PM	0.00	True	False	False	False	Nguyen, Nuong Thi	12:17:03 AM	(via Web)
Ba.		Old	End Lunch	3/19/2009 3:00:00 PM	0.00	True	False	False	False	Nguyen, Nuong Thi	3/21/2009	Nguyen, Phong
	Update			3/19/2009 3:00:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	12:17:04 AM	(via Web)
B.	Jodate			3/19/2009 9:36:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi		Nguyen, Phong
				3/19/2009 5:00:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	12:17:05 AM	(via Web)
	Jodate			3/20/2009 8:25:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/21/2009	Nguyen, Phong
•	Jodate		Clock	3/20/2009 8:25:00 AM	0.00	True	True	False	Faise	Nguyen, Nuong Thi	12:17:05 AM	(via Web)
2	Jpdate -	Old	Start Lunch	3/20/2009 2:11:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/21/2009	Nguyen, Phōng
•	Jpcale 1	Vew	Start Lunchi	3/20/2009 2:11:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	12:17:06 AM	(via Web)
	Jpdate,			3/20/2009 2:34:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/21/2009	Nguyen, Phong
0	opdate	vew [End Lunch	3/20/2009 2:34:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	12:17:06 AM	(via Web)
	Jpdate	Old C	Clock	3/20/2009 7:05:00:PM	00.C	False	False	False	False	Nguyen, Nuong Thi	3/21/2009	Nguyen, Phong
0				3/20/2009 5:05:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	12:17:07 AM	(via Web)

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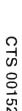


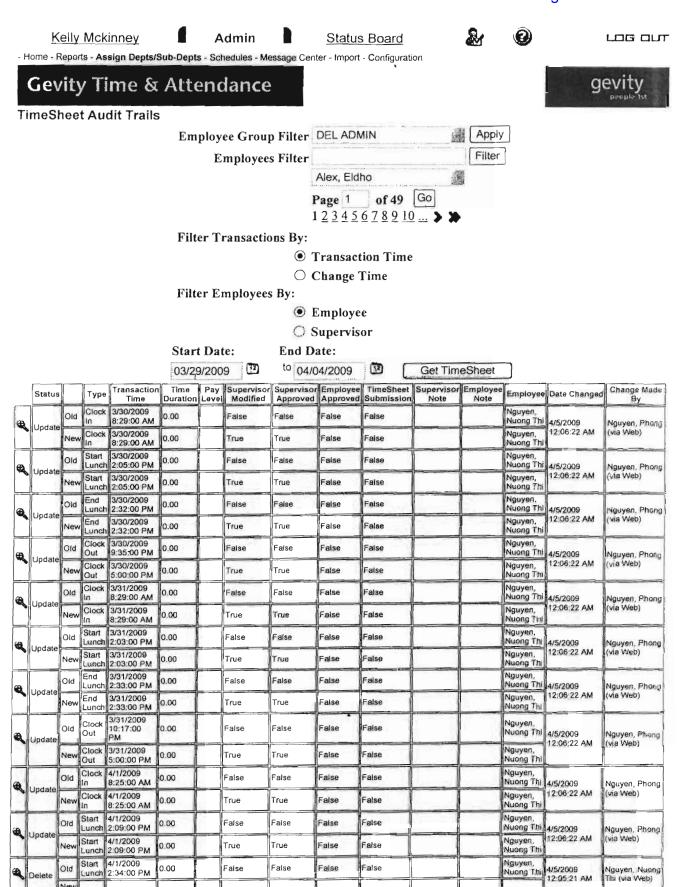


60		Old	ſn	8:27:00 AM	0.00	False	False	False	False	Nuong Thi		Phong
€.	Update	New	Clock In	3/25/2009 8:27:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	3/27/2009 10:45:29 AM	(via Web)
6	Update	Old	Start Lunch	3/25/2009 2:09:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/27/2009	Nguyer
-	Opuate	New	Start Lunch	3/25/2009 2:09:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:45:29 AM	(via Web)
e		Old	End Lunch	3/25/2009 2:36:00 PM	0.00	False	False	False	False	Nguyen. Nuong Thi	3/27/2009	Nguyer
_	Update	New	End Lunch	3/25/2009 2:36:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:45:29 AM	(via Web)
e,	Update	Old	Clock Out	3/25/2009 9:18:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/27/2009	Nguyer
-0	Opdate	New	Clock Out	3/25/2009 4:18:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:45:29 AM	(via Web)
4		Old	Clock	3/26/2009 8:26:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/27/2009	Nguyer
-	Update	New	Clock	3/26/2009 8:26:00 AM	0.00	True	True	False	False	Nguyen. Nuong Thi	10:45:30 AM	(via Web)
a.		Old	Start Lunch	3/26/2009 1:55:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/27/2009	Nguyer
-	Update	New	Start Lunch	3/26/2009 1:55:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:45:30 AM	(via Web)
a	Update	Old	End Lunch	3/26/2009 2:31:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/27/2009	Nguyer
	Opdate	New	End Lunch	3/26/2009 2:31:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:45:30 AM	(via Web)
B	Update	Old	Clock Out	3/26/2009 7:51:00 PM	0.00 (False	False	False	False	Nguyen, Nuong Thi	3/27/2009	Nguyen
	Opuate	New	Clock Out	3/26/2009 4:51:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:45:30 AM	(via Web)
e.	Update	Old	Clock In	3/27/2009 8:29:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/27/2009	Nguyen Phong
	Орчан	New	Clock In	3/27/2009 8:29:00 AM	0.00	True	False	False	False	Nguyen, Nuong Thi	10:45:30 AM	(via Web)
A	Lladata	Old	Clock In	3/27/2009 8:29:00 AM	0.00	True	False	False	False	Nguyen, Nuong Thi	3/28/2009	Nguyen Phong
0	Update	New		3/27/2009 8:29:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	11:09:13 PM	(via Web)
	Update	Old		3/27/2009 2:00:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/28/2009	Nguyen Phong
*	Opdate	New	Start Lunch	3/27/2009 2:00:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	11:09:13 PM	(via Web)
4	Update	Old		3/27/2009 2:32:00 PM	0.00	False	False	Faíse	False	Nguyen, Nuong Thi	3/28/2009	Nguyen Phong
*				3/27/2009 2:32:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	11:09:13 PM	(via Web)
				3/27/2009 8:50:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	3/28/2009	Nguyen Phong
•	Update			3/27/2009 4:50:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	11:09:13 PM	(via Web)

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End 4/1/2009

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43	li le de :			2:34:00 PM	0.00	False	False	False	False	<u> </u>	Nuong Th	4/5/2009	Nguyen, Phor
-	Updat	Ne	w End	4/1/2009 th 2:34:00 PM	0.00	True	True	False	False		Nguyen, Nuong Thi	12:06:22 AM	(via Web)
Ð	Updati	Old	Cloc	4/1/2009 7:30:00 PM	0.00	False	False	Fälse	False		Nguyen, Nuong Thi		Nguyen, Pho
	Ориан	Ne	Cloc	4/1/2009 5:00:00 PM	0.00	True	True	False	False		Nguyen, Nuong Thi	12:06:22 AM	(via Web)
•	Update	010	Cloc	4/2/2009 8:30:00 AM	0.00	False	False	False	False		Nguyen, Nuong Thi	4/5/2009	Nguyen, Pho
7	Opdak	Nev	Cloc	4/2/2009 8:30:00 AM	0.00	True	True	False	False		Nguyen, Nuong Thi	12:06:22 AM	(via Web)
B	Delete		Lunc		0.00	False	False	False	False		Nguyen, Nuong Thi	4/3/2009 8:28:08 AM	AUTO_LUNC
-		Nev	Start	4/2/2009	0.00	False	False	False			Nguyen,	0.20.00 7.01	(via Web)
	Delete	Nev	Lunc	2:30:00 PM	0.00	raise	False	raise	False		Nuong Thi	4/3/2009 8:28:34 AM	ATTENDANT (via Web)
4	Delete	Old	Start	4/2/2009 2:30:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	4/3/2009 8:29:08 AM	AUTO_LUNC ATTENDANT (via Web)
Ð,	Delete	Old	Start	4/2/2009 2:30:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	4/3/2009	AUTO_LUNC ATTENDANT
_		Nev	-	4/2/2000								1:51:23 PM	(via Web)
A.	Delete	Old		4/2/2009 2:30:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	4/3/2009 2:34:03 PM	AUTO_LUNC ATTENDANT (via Web)
2		Old	Start	4/2/2009 2:30:00 PM	0.00	False	False	False	False	+	Nguyen,	4/3/2009	AUTO_LUNC
	Delete	New		2.30.00 PM							Nuong Thi	5:33:46 PM	(via Web)
a,	Delete	Old	Start Lunck	4/2/2009 2:30:00 PM	0.00	False	False	False	False		Nguyen. Nuong Thi	4/5/2009 12:05:21 AM	AUTO_LUNC
2	Delete	Old	Start	4/2/2009 2:30:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	4/5/2009	(via Web) AUTO_LUNC
		New		4/2/2000								12:05:44 AM	(via Web)
	Update	Old	Start Lunch Start	4/2/2009	0.00	False	False	False	False		Nguyen, Nuong Thi Nguyen,	4/5/2009 12:06:22 AM	Nguyen, Phon (via Web)
2	Oelete	Old	End Lunch	2:30:00 PM 4/2/2009 3:00:00 PM	0.00	False	False	False	False		Nuong Thi Nguyen, Nuong Thi	4/3/2009	AUTO_LUNC
	Delete	New										8:28:08 AM	(wa Web)
2	Delete	Old	End Lunch	4/2/2009 3:00:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	4/3/2009 8:28:34 AM	AUTO_LUNC! ATTENDANT (via Web)
à.	Delete	Old	End Lunch	4/2/2009 3:00:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	4/3/2:009 8:29:08 AM	AUTO_LUNCH ATTENDANT (via VVeb)
	Delete	Old	End Lunch	4/2/2009 3:00:00 PM	0.00	False	False	False	False		Nguyen, Nuong Thi	4/3/2009 1:51:23 PM	AUTO_LUNCH
		Old		4/2/2009 3:00:00 PM	0.00	False	False	False	False		Nguyen, Nuncy Thi	4/3/2009	(via Web) AUTO_LUNCH ATTENDANT
1		New	Cod	4/2/2009								2:34:03 PM	(via Web)
6	Delete 🏻	Old	End Lunch	3:00:00 PM	0 00	False	False	False	False		Nguyen, Nuong Thi	4/3/2009 5:33:46 PM	AUTO_LUNCH ATTENDANT (via Web)
	Delete	Old	End Lunch	4/2/2009 3:00:00 PM	5.00	False	False	False	False		Nguyen, Nuong Tali	4/5/2009 12:05:21 AM	AUTO_LUNCH ATTENDANT (via Web)
	Delete	Old		4/2/2009 3:00:00 PM	0.00	False	False	False	False			4/5/2009 12:05:44 AM	AUTO LUNCH
t		New Old		4/2/2009	10.00	False	False	False	False		Nguyen,		(via Web)
	Jodate		End	4/2/2009	0.00	True	False	False	False		linda Louis	4/5/2009 12:06:22 AM	Nguyen, Phono (via Web)
	-	714	End	4/2/2009	0.00	True	False	False	False		Nuong Thi Nguyen,		
	pdate		End	4/2/2000	0.00	True	True	False	False		Nuong Thi , Nguyen, Nuong Thi	4/5/2009 12:06:22 AM	Nguyen, Phone (via Web)
Ť			Clock	4/2/2009	0.00	False	False	False	False		Nguyen,	4/5/2009	Markey Che-
L	Jpdate -	Jaw	Clock	1/0/0000	0.00	True	True	False	Faise			12:06:22 AM	(via Wieb)
1		-		4/3/2009			-	1	Y	-	Nguyen,		

Case 4:09-cv-02653 Document 14 Filed in TXSD on 04/26/10 Page 32 of 30 of 3

a	Delete	Old	In	8:28:00 AM	0.00	False	False	False	False	Nuong Thi	4/5/2009	Nguyen, Nuong
	Delete	New									12:05:44 AM	Thi (via Web)
B	Delete			4/3/2009 8:28:00 AM	0.00	False	False	False	False '	Nguyen, Nuong Thi	4/5/2009 12:05:44 AM	Nguyen, Nuong
		New	1								12.05:44 AM	Thi (via Web)
4	Update	Old	Clock In	4/3/2009 8:29:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	4/5/2009	Nguyen, Phong
	Opdate	New		4/3/2009 8:29:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	12:06:23 AM	(via Web)
a	Update	Old		4/3/2009 1:51:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	4/5/2009	Nguyen, Phong
	Opdate	New		4/3/2009 1:51:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	12:06:23 AM	(via Web)
a	Update	Old		4/3/2009 2:34:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	4/5/2009	Nguyen, Phong
	Opuale	New		4/3/2009 2:34:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	12:06:23 AM	(via Web)
30	Lindata	Oid		4/3/2009 5:33:00 PM	0.00	False	Faise	False	False	Nguyen, Nuong Thi	4/5/2009	Nguyen, Phong
-		New		4/3/2009 5:00:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	12:06:23 AM	(via Web)

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Web)

Nguyen Phong

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via Web)

Nguyen, Nuong Thi

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Nguyen, Nuong Thi

11:25:45 AM

4/8/2009 11:25:45 AM

11:25:45 AM

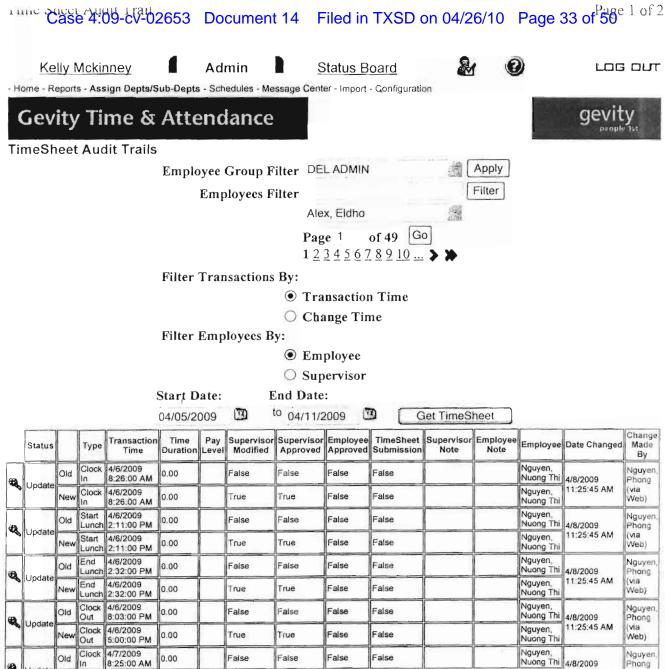
4/8/2009 11:25:45 AM

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4/7/2009 2:30:00 PM

4/7/2009 2:30:00 PM

4/7/2009 9:41:00 PM

5:00:00 PM 4/7/2009 9:42:00 PM

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æ,		Old		8:31:00 AM	0.00	False	False	False	False	Nuong Thi	4/8/2009	Nguye
-	Update	New	Clock In	4/8/2009 8:31:00 AM	0.00	True	False	False	False	Nguyen, Nuong Thi	11:25:45 AM	(via (Web)
a,	Update	Old	Clock In	4/8/2009 8:31:00 AM	0.00	True	False	False	False	Nguyen, Nuong Thi		Nguye
_		New	Clock	4/8/2009 8:31:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:37:42 AM	(via Web)
P.	Update	Old	Start Lunch	4/8/2009 2:04:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi		Nguye
_		New	Start Lunch	4/8/2009 2:04:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:37:42 AM	(via Web)
ea,	Update	Old	End Lunch	4/8/2009 2:35:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	10.10.00.00	Nguye
_		New	End Lunch	4/8/2009 2:35:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:37:42 AM	(via Web)
Đ,	Update	Old	Clock	4/8/2009 8:03:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	to the second	Nguye Phong
		New	Clock Out	4/8/2009 5:00:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:37:42 AM	(via Web)
a,	Update	Old	Clock In	4/9/2009 8:28:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	4/10/2009	Nguye Phong
_		New	Clack In	4/9/2009 8:28:00 AM	0.00	True	True	Faise	False	Nguyen, Nuong Thi	10:37:42 AM	(via Web)
Đ,	Update	Old	Start Lunch	4/9/2009 2:05:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi		Nguye Phong
		New	Start Lunch	4/9/2009 2:05:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:37:42 AM	(via Web)
2	Update	Old	End	4/9/2009 2:36:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	4/10/2009	Nguye Phong
		New	End Lunch	4/9/2009 2:36:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:37:42 AM	(via Web)
a,	Update	Old	Clock Out	4/9/2009 6:00:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	4/10/2009	Nguye Phong
		New	Clock Out	4/9/2009 5:00:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	10:37:43 AM	(via Web)
2	Update	Old	In	4/10/2009 8:26:00 AM	0.00	False	False	False	False	Nguyen, Nuong Thi	4/10/2009	Nguye Phong
		New	Clock	4/10/2009 8:26:00 AM	0.00	True	False	False	False	Nguyen, Nuong Thi	10:37:43 AM	(via (Web)
2	Update	Old	Clock	4/10/2009 8:26:00 AM	0.00	True	False	False	False	Nguyen, Nuong Thi	4/11/2009 6:28:23 PM	Phong
		New	In	4/10/2009 8:26:00 AM	0.00	True	True	False	False	Nguyen, Nuong Thi	0.20,23 FW	(via Web)
	Update	Old	Lunch	4/10/2009 1:52:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	4/11/2009 6:28:23 PM	Nguye Phong (via
4		New	Lunch	4/10/2009 1:52:00 PM	0.00	True	True	False	False	Nguyen Nuong Thi	0.20, 23 1 %	Web)
	Update	Old	Lunch	4/10/2009 2:32:00 PM	0.00	False	False	False	False	Nguyen, Nuang Thi	4/11/2009 6:28:23 PM	Nguyer Phong (via
		New	Lunch	4/10/2009 2:32:00 PM	0.00	True	True	False	False	Nguyen, Nuong Thi	5.20.23 FW	(Web)
	Update	Ola	Out	4/10/2009 6:50:00 PM	0.00	False	False	False	False	Nguyen, Nuong Thi	4/11/2009 6:28:23 PM	Nguyer Phong (via
				4/10/2009 5:00:00 PM	0.00	True © Cop	True	False	False	Nguyen, Nuong Thi	J.LU.LU F.WI	West)

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(via Web)

AUTO_LUNCH ATTENDANT (via Web)

Nguyen, Nuong Thi 4/15/2009 8:27:41 AM

Nguyen, Nuong Thi 4/15/2009 1:15/2009 2:45:13 PM

Nguyen, Nuong Thi 4/15/2009 Nguyen, 2:45:14 PM

Nguyen, Nuong Thi Nuong Thi 4/15/2009 2:45:14 PM

Nguyen, Nuong Thi 4/15/2009 2:45:30 PM

Nguyen, Nuong Thi

Nguyen, Nuong Thi

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Nuong Thi Nguyen, Nuong Thi 4/15/2009

Nguyen,



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End 4/13/2009 Lunch 2:45:00 PM

End 4/13/2009 Lunch 2:45.00 PM

Lunch 2:45:00 PM End 4/13/2009 Lunch 2:45:00 PM

End 4/13/2009 Lunch 2:45:00 PM

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Time Sheet Audit Trail Case 4:09-cv-02653 Document 14 Filed in TXSD on 04/26/10 Page 37 of 50 age 3 of 3

Update New Clock 4/16/2009 0.00 True True False False Nguyen, Nuong Thi

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IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION



DEFENDANT'S RESPONSE TO PLAINTIFFS' FIRST REQUEST FOR PRODUCTION

TO: Plaintiffs, by and through their attorneys of record, Charlie T. Nhan and Scott K. Bui, Bui & Nhan, P.L.L.C., 3921 Ocee, Houston, Texas 77063

Defendant Computer Technology Solutions, L.P. ("CTS") serves the following Response to Plaintiffs' First Request for Production to Defendant.

GENERAL OBJECTIONS

- 1. The following general objections are made with respect to each request for production. Inclusion of one or more of CTS's general objections in specific objections to a given request for production does not waive the remainder of these general objections to that request for production.
- CTS objects to Plaintiffs' Definitions and Instructions to the extent they impose or attempt to impose obligations different from those or beyond those imposed by the Federal Rules of Civil Procedure.

To:

- 3. CTS objects to each request for "any" or "all" documents as overbroad, unduly burdensome, lacking relevance and not reasonably tailored to lead to the discovery of admissible evidence. CTS will construe each request as one limited to the specific documents identified with particularity in the request.
- 4. CTS objects to the definition of "You" and "Your" as overly broad, unduly burdensome, vague and ambiguous to the extent that it includes "all attorneys, agents, and other natural persons or business or legal entities acting or purporting to act for or on behalf of Defendant, whether authorized to do so or not." Such a request exceeds the scope of document discovery permitted under Federal Rule of Civil Procedure. CTS further objects that this overly broad definition encompasses persons and entities that are not relevant to this action and their inclusion is not reasonably calculated to lead to the discovery of admissible evidence, but renders the requests unduly burdensome. Finally, CTS objects to the inclusion in this definition of "attorneys" to the extent that this violates the attorney-client communication privilege or work product doctrine.
- 5. CTS objects to all discovery requests to the extent they seek information exempted from discovery pursuant to the attorney-client privilege, the attorney work-product doctrine, or other applicable privileges. CTS specifically objects to revealing privileged information or work product relating to this litigation and compiled or prepared in anticipation of this litigation by or for its counsel, including, without limitation, correspondence and other communications between CTS and its counsel; factual and legal memoranda prepared by or for counsel; attorney notes, outlines, summaries, and similar documents; drafts of pleadings or similar documents; and factual summaries or other communications prepared by CTS at the request of or for the use of its counsel.

- 6. CTS objects to producing any electronically stored information that is not reasonably accessible, including any documents that cannot be obtained without incurring undue burden or cost. CTS further objects to producing electronically stored information that cannot be obtained through the use of reasonable, targeted and/or keyword search techniques, as identified by CTS. CTS further objects to producing any electronically stored information in any form other than that in which it is ordinarily obtained or which is reasonably useable, as identified by CTS or agreed upon by the parties.
- 7. CTS objects to all discovery requests to the extent that they are not limited to the relevant time period. CTS will generally adopt the period beginning August 18, 2006 for Plaintiffs Bich-Chau Thi Tran and James Guynon and January 19, 2007 for all other Plaintiffs and ending January 1, 2010 as the relevant time period and will produce responsive, discoverable documents for that time period.
- 8. CTS further states that these responses are based on information currently available to it and its counsel and that its investigation regarding this case is on-going. CTS reserves the right to supplement its responses as additional information becomes available.

Respectfully submitted,

VINSON & ELKINS L.L.P.

OF COUNSEL: VINSON & ELKINS L.L.P. 1001 Fannin Street, Suite 2500 Houston, Texas 77002-6760

THOMAS H. WILSON Attorney-in-charge State Bar No. 21726500 Federal No. 6585 MARTIN C. LUFF State Bar No. 24065650 Federal No. 1012319 First City Tower, Suite 2500 1001 Fannin Street Houston, Texas 77002-6760 (713) 758.2042 – Telephone (713) 615.5704 - Facsimile

ATTORNEYS FOR DEFENDANT COMPUTER TECHNOLOGY SOLUTIONS, L.P.

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of April, 2010, a copy of the foregoing document was served on Plaintiffs' counsel by facsimile and courier to:

Counsel for Plaintiffs Charlie T. Nhan and Scott K. Bui Bui & Nhan, P.L.L.C. 3921 Ocee Houston, Texas 77063

DEFENDANT'S RESPONSE TO PLAINTIFFS' FIRST REQUEST FOR PRODUCTION

PLAINTIFFS' SPECIFIC PAYROLL INFORMATION

1. All time sheets and other records for every Plaintiff indicating the hours each Plaintiff worked for the relevant period.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

The personnel file (in their entirety) for each Plaintiff.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

3. All tax information related to each Plaintiff including, but not limited to, all w-2s.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

4. All documents that reflect your method of calculating the pay of each Plaintiff.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

5 All payroll information for each Plaintiff, including all pay stubs.

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

All documents recording the number of hours worked by each Plaintiff.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

Any and all payroll documents, including electronic data form between CTS and Pro Staff.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

8. Any and all payroll documents, including electronic data form between CTS and Gevity.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

Q Any and all payroll documents, including electronic data form between CTS and Computer Repair, and/or Kristi Quan Hoang, and/or Tony T. Nguyen.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS responds that it does not have any responsive, non-privileged documents in its possession, custody, or control.

- 10. All records showing that Defendant has maintained the following information on each Plaintiff:
 - Employee's full name and social security number.

- b. Address, including zip code.
- Birth date, if younger than 19. c.
- d. Sex and occupation.
- Time and day of week when employee's workweek begins. e.
- f. Hours worked each day.
- Total hours worked each workweek, g.
- h. Total wages paid each pay period.
- i. Date of payment and the pay period covered by the payment.
- Total daily or weekly straight-time earnings, including regular pay rate. j.
- k. Total overtime earnings for the work week.
- All additions to or deductions from the employees' wages. 1.
- Basis on which employee's wages are paid (e.g., "\$6 an hour", "\$220 a week", m. "piecework")

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

CTS POLICIES AND PROCEDURES

CTS policies and procedures as it relates to your employees from 2006 to the present time, including all prior versions if they have changed since 2006. Specifically, policies and procedures for temporary employees and/or permanent or full-time employees.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

2. All written policies regarding payroll, method of pay and overtime pay.

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

3. All written policies regarding bonuses.

RESPONSE:

CTS has no such policies.

4. In addition to the work performed for and on behalf of CTS, please provide all written policies regarding provisions for any and all work performed by employees for other subcontractors and/or vendors.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

5. All written policies regarding vacation days, sick days, holidays and whether plaintiffs were paid for such days.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

PRIOR COMPLAINTS AND REPORTS

1. All written complaints, concerns or questions from any person, employees, and/or Plaintiff regarding Defendant's payment of wages, tracking of time, payment of overtime, or any other issue that relates to payroll.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

2. All documents sent to or received by the Department of Labor or any other governmental agency or body (state, federal, local or otherwise), regarding any complaint against any of the Defendant with respect to payment of wages or compliance with the Fair Labor Standards Act or allegations of discrimination from 2006 until the present.

RESPONSE:

CTS objects to this request in its entirety as overly-broad, unduly burdensome, and calls for information that is irrelevant and not likely to lead to the discovery of admissible evidence.

All invoices and documents reflecting opinions or comments from attorneys; accountants, or other advisors that relate to services provided regarding compliance with the Fair Labor Standards Act from 2006 to the present.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. CTS further objects to the extent this request requires CTS to produce statements protected by the attorney-client or attorney work product privilege. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

INSURANCE

Copies of any and all liability insurance policies held by any Defendant CTS that might 1. provide coverage for any claim raised in this lawsuit.

RESPONSE:

There are none.

TRIAL DOCUMENTS

Copies of any and all books, documents or other tangible things which may be used at the I time of trial of this lawsuit.

RESPONSE:

CTS objects to this request as it requests information protected by the attorney work product privilege. CTS will produce its trial exhibits at the time provided by the Court in its Scheduling Order.

Copies of any and all tangible things whose production has not been requested previously in this or other requests which any Defendant may use as demonstrative evidence at trial.

CTS objects to this request as it requests information protected by the attorney work product privilege. CTS will produce its trial exhibits at the time provided by the Court in its Scheduling Order.

3. All written statements made by Defendant CTS, its officers, directors, and/or authorized agent that pertain to this lawsuit, documents which are in the possession, custody or control of CTS.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. CTS further objects to the extent this request requires CTS to produce statements protected by the attorney-client or attorney work product privilege. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

4. All oral statements made by CTS, including its officers, directors, and/or authorized agent, that pertain to this lawsuit which were either recorded or taped on an electronic device or recorder which are in the possession, custody or control of any Defendant, its attorney or anyone acting on its behalf.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. CTS further objects to the extent this request requires CTS to produce statements protected by the attorney-client or attorney work product privilege. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

5. Copy of any and all written contract agreement between CTS and Apple Company with respect to the work to be performed by CTS.

RESPONSE:

CTS objects to this request in its entirety as overly-broad, unduly burdensome, and calls for information that is irrelevant and not likely to lead to the discovery of admissible evidence. CTS further objects to the extent that this request calls for the production of proprietary or confidential information.

6. Copy of any and all written contract agreement between CTS and Apple Company with respect to the compensation to be paid by Apple Company to CTS for the work to be performed by CTS.

RESPONSE:

CTS objects to this request in its entirety as overly-broad, unduly burdensome, and calls for information that is irrelevant and not likely to lead to the discovery of admissible evidence.

CTS further objects to the extent that this request calls for the production of proprietary or confidential information.

Copy of any and all written contract agreement between CTS and Computer Repair, and/or Kristi Quan Hoang, and/or Tony T. Nguyen.

RESPONSE:

There is none.

8. Copy of all written documents, including electronic logs, and or print outs of daily items received by CTS from Apple Company.

RESPONSE:

CTS objects to this request in its entirety as overly-broad, unduly burdensome, and calls for information that is irrelevant and not likely to lead to the discovery of admissible evidence. CTS further objects to the extent that this request calls for the production of proprietary or confidential information.

Q Copy of all written documents, including electronic logs, and or print outs of daily items completed and send out to Apple Company from CTS.

RESPONSE:

CTS objects to this request in its entirety as overly-broad, unduly burdensome, and calls for information that is irrelevant and not likely to lead to the discovery of admissible evidence. CTS further objects to the extent that this request calls for the production of proprietary or confidential information.

EXPERTS

All written reports of inspection, tests, writings, drawings, graphs, charts, recordings or opinions of any expert who has been used for consultation in connection with this lawsuit and whose work product was reviewed in whole or in part by an expert who is to be called as a witness.

RESPONSE:

CTS has not used any experts, but will supplement this response if experts are used in the future.

A curriculum vitae or resume for any consulting expert whose mental impressions or 2. opinions have been reviewed by a testifying expert.

CTS has not used any experts, but will supplement this response if experts are used in the future.

MISCELLANEOUS

1. Produce all records that you obtain via subpoena, deposition on written question or any other legal instrument used to obtain records from non-parties. This request requires that you produce copies of all records obtained through any record retrieval company.

RESPONSE:

CTS objects to the extent that this request is not relevant, overly-broad, vague, ambiguous and lacking specificity. Subject to and without waiving its objections, CTS will produce responsive, non-privileged documents in its possession, custody, or control and will supplement its production as appropriate.

2. All of CTS's bank statements for 2007, 2008, and 2009 that were used to operate its business.

RESPONSE:

CTS objects to this request in its entirety as overly-broad, unduly burdensome, and calls for information that is irrelevant and not likely to lead to the discovery of admissible evidence. CTS further objects to the extent that this request calls for the production of proprietary or confidential information.

3. Income tax returns for CTS, beginning with tax year 2007, 2008, and 2009, including the present, and including all W-2 forms. If you did not retain copies of those documents in your records, please execute the attached IRS Form 4506, which will authorize this Plaintiff to obtain such records directly from the IRS.

RESPONSE:

CTS objects to this request in its entirety as overly-broad, unduly burdensome, and calls for information that is irrelevant and not likely to lead to the discovery of admissible evidence. CTS further objects to the extent that this request calls for the production of proprietary or confidential information.

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